

Dinah Lynn Bolton - #2373
20230 Fenelon Street
Detroit, MI 48234
313-893-3148
dinahtyus@sbcglobal.net

FILED (I)

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**U.S. BANKRUPTCY COURT
E.D. MICHIGAN-DETROIT**

Clerk of the Court
United States Bankruptcy Court
211 W. Fort Street
Suite 2100
Detroit, MI 48226

August 19, 2016

RE: Motion/Response Filed by Creditor Dinah Lynn Bolton to the Debtor's Forty-Fourth Omnibus Objection to Certain Claims - #2373 – Case No. 13-53846. (Related document(s) [11231, 11230, 11255, 11283, 11287, and 11288])

Dear United States Bankruptcy Court:

The Creditor, Dinah Lynn Bolton, would like to submit this Motion/Response to the Communication received by the City of Detroit/Debtor. (See attachment)

The Creditor has been an employee of the Planning and Development Department (P&DD) / Housing and Revitalization Department (HRD) since 1998.

The Creditor has worked on various assignments at the City of Detroit which include:

- *HUD Section 108 Loans – March 2008 to present (Classified as Federal Grant Funded);
- *HUD Neighborhood Stabilization Program 1 – January 2011 to November 2015
(Classified as Federal Grant Funded);
- *HUD Neighborhood Stabilization Program 3 – January 2011 to November 2015
(Classified as Federal Grant Funded);
- *Community Development Block Grant Contracts (Public Facility Rehabilitation) –
December 2013 to December 2014, (Classified as Federal Grant Funded),
- *Development Land Sales, Title Clearance, and
- *Tax Abatements – January 2014 to present.

The Creditor does not know why the Debtor/City of Detroit has my position and/or assignments classified as General Fund. However, they are in fact Federal Grant Funded.

P&DD changed the classification of the majority of my co-workers in the Development Division to General Fund previously as a whole.

Although the City may have corrected / changed my co-workers' classification, they should have not changed mine in the system since I continued to do many Federal Grant Funded assignments.

The Creditor has attached her P&DD Personnel Activity Reports (PAR) for 2007 to 2015 to show the classification of her work assignments as Federal Grant Funded.

The Creditor has attached work emails to show the various Federal Grant Funded assignments she has worked on for the City.

The Creditor can provide actual work product if needed to verify her assignments as long as information can remain confidential.

The City states that although our positions were Federal Grant funded this does not include the fringe benefits.

The Creditor has attached documentation from the P&DD/ HRD Departments that shows that salaries/ wages, and fringe benefits were in fact paid with Federal Grant funds.

Since the Creditor's salary/wages were funded by Federal Grant funds, it had no impact on the City's bankruptcy.

The Debtor (City) bases its objection on the implementation of the Debtor's CETs. The Federal Grant Funding has no relation to the bankruptcy.

Based on these arguments, the Creditor should have opportunity to have its claim heard.

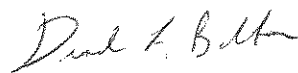
For these reasons the Creditor requests that this Honorable Court allow this information to be placed in the Court records.

For these reasons, the City of Detroit should not be allowed to disallow and / or expunge my claim, or zero out my claim.

The Creditor would like to request that she be excused from attendance of the hearing to be held on August 31, 2016, due to Jury Duty Summons. (See attachment)

Wherefore, for these proofs, the Creditor honorably requests that the Court consider this information in its case (Related document(s) [11230, 11231, 11255, 11283, 11287 and 11288])

Sincerely,



Dinah L. Bolton

cc: Marc N. Swanson, Miller, Canfield, Paddock and Stone, PLC

Founded in 1852
by Sidney Davy Miller

MILLER CANFIELD

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August 10, 2016

Dinah Bolton
20230 Fenelon Street
Detroit, MI 48234

Re: City of Detroit Bankruptcy Case No: 13-53846
Your Proof Of Claim No: 2373

Dear Ms. Bolton:

As you are aware, your Proof Of Claim as indicated above is currently pending before the Bankruptcy Court. As stated in Paragraph 2 of the Court's Order of June 24, 2016, the Court has set a hearing for August 31, 2016 on the City's objections to your Claim. A copy of that Order was previously sent to you and is enclosed for your convenience.

Although you have alleged in your Claim that your position prior to bankruptcy was grant funded, the City's review of your payroll history indicates that your position was grant funded only as of 2014. It is the City's position that you therefore have no claim to recoupment of the pre-bankruptcy 10% reduction to your salary. The salary and benefit reductions alleged in your Claim resulted from the lawful imposition of City Employment Terms ("CETs"). The City has objected to all Claims based on losses incurred as a result of CETs because the City was legally authorized to impose the CETs and it stands by that objection in your case.

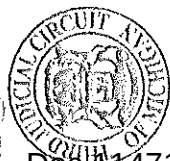
Very truly yours,

Miller, Canfield, Paddock and Stone, P.L.C.

By: _____


John H. Willems

JHW/jw



THIRD JUDICIAL CIRCUIT OF MICHIGAN
ATTN: JURY SERVICES DEPARTMENT
TWO WOODWARD AVE., ROOM 313
DETROIT, MI 48226-3481

**SUMMONS FOR ATTENDANCE
OF PETIT JUROR**

**CIRCUIT
FMHJ**

082095



8116

Dinah Lynn Bolton
20230 Fenelon St
Detroit MI 48234-2207

002905189



By order of the Chief Judge of the Third Judicial Circuit of Michigan, you are hereby ordered to appear for jury service.

INSTRUCTIONS FOR JURORS

WHEN AND WHERE TO APPEAR: TO DETERMINE WHETHER YOUR GROUP 357 IS SCHEDULED TO REPORT TO FRANK MURPHY HALL OF JUSTICE AT THE DATE AND TIME INDICATED ON THIS SUMMONS, YOU MUST EITHER VISIT THE COURT WEBSITE www.3rdcc.org OR CALL (313) 224-2667 ANYTIME AFTER 5:00p.m. THE DAY BEFORE YOUR SERVICE DATE. FAILURE TO REPORT AS ORDERED BY THIS SUMMONS MAY RESULT IN A FINE AND/OR IMPRISONMENT FOR CONTEMPT OF COURT.

Complete your questionnaire online (or return your questionnaire) even if you are requesting to be excused or postponed. All requests for a postponement or excusal must include documentation.

You will receive written confirmation if your request has been granted or denied. If you do not receive written confirmation, please call (313) 224-2507 between the hours of 11:00AM and 3:30PM.

BRING YOUR SUMMONS WITH YOU WHEN YOU REPORT FOR JURY SERVICE

Dinah Lynn Bolton

JUROR IDENTIFICATION NUMBER: 002905189



GROUP NUMBER: 357

SERVICE DATE: 08/31/2016

TIME: 7:30 AM

REPORT TO:

Jury Services Department
Frank Murphy Hall of Justice
1441 St. Antoine Street, Room 100
Detroit, MI 48226-2385

ALL JURORS MUST VISIT www.3rdcc.org OR CALL (313) 224-2667 AFTER 5:00 PM THE EVENING BEFORE DATE OF SERVICE TO CONFIRM SERVICE.

